

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE INSLAW, INC.,

Debtor-in-Possession

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INSLAW, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA  
and the UNITED STATES  
DEPARTMENT OF JUSTICE,

Defendants.

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)  
) Bankruptcy Case

) No. 85-0070  
)  
)  
)

)  
)  
) Adversary Proceeding

) No. 86-0069  
)  
)

CL/IW/DE-01

DECLARATION OF PETER VIDENIEKS

1. My name is Peter Videnieks. From September 1981 to September 1990, I was employed by the Department of Justice as a contracting officer. Since September 23, 1990, I have been employed by the United States Customs Service as Director of the Operational Procurement Division.

2. I am making this declaration in accordance with the provisions of 28 U.S.C. §1746 and in response to statements made in the Affidavit of Michael J. Riconosciuto, which was attached as Exhibit 1 to the Third Supplemental Submission of Inslaw in Support of Its Motion To Take Limited Discovery, filed in this proceeding on March 23, 1991.

3. I will address below each of the paragraphs in Mr. Riconosciuto's affidavit which refers to me; before doing so, however, I wish to state categorically that, insofar as they relate to me, Mr. Riconosciuto's allegations of improper



or illegal activity are, without exception, untrue. Indeed, virtually every single factual statement made about me in the affidavit is untrue.

4. I do not know and, as far as I am aware, I have never met or talked to Mr. Riconosciuto. In fact, I had never even heard of him prior to Friday, March 22, 1991, when I was informed that a reporter with the Saint Louis Post-Dispatch wished to talk to me about an affidavit that was going to be filed bearing Mr. Riconosciuto's name.

5. The allegations in paragraph 6 of the affidavit are false. I had never heard of the Wackenhut-Cabazon joint venture before reviewing the affidavit, I have never visited such a joint venture, and as far as I am aware I have never had any contact whatsoever with a Wackenhut-Cabazon joint venture. Indeed, I do not know whether such a joint venture ever existed and, if so, what it did. The assertion that Earl W. Brian was my "close associate" is also a lie. I do not know Earl W. Brian, I have never worked with him in any capacity, and as far as I know I have never had any conversations or meetings with him.

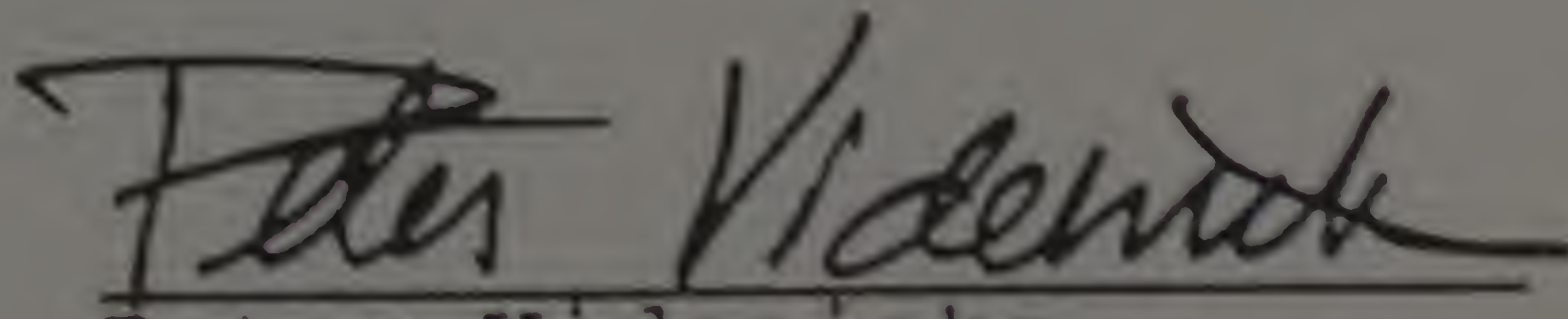
6. The statement in paragraph 7 that I gave Mr. Brian PROMIS computer software is false. As mentioned above, so far as I am aware I have never even met Mr. Brian, and I have certainly not given him any computer software, PROMIS or otherwise.

7. Paragraphs 11 through 15 of Mr. Riconosciuto's affidavit are a complete fabrication. I was not employed by



the U.S. Department of Justice in February 1991; I left the Department and came to the U.S. Customs Service on September 23, 1990. I have never had a conversation of any sort with Mr. Riconosciuto, and I have absolutely never attempted to discourage him or anyone else from cooperating with the House Judiciary Committee's investigation. As is evident from the fact that I never knew or had contacts with Mr. Riconosciuto, I have no idea if Mr. Riconosciuto's wife has a child custody dispute, nor do I have any idea if there are any criminal prosecutions or investigations in Orange County, California (or elsewhere) relating to Mr. Riconosciuto, and thus I certainly have not made any threats or promises with regard to any such proceedings.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 27, 1991.

  
Peter Videnieks